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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DR. RUPA BALA,

Plaintiff,

v.

OREGON HEALTH AND SCIENCE
UNIVERSITY, an Oregon public
corporation; DR. CHARLES HENRIKSON,
an individual; DR. JOAQUIN CIGARROA,
an individual,

Defendants.

No.: 3:18-CV-00850-HZ

**DECLARATION OF MEGAN S.
BRADFORD IN SUPPORT OF
DEFENDANTS' MOTIONS TO
EXCLUDE EXPERTS**

I, Megan S. Bradford, declare and state as follows:

1. I am an attorney at Stoel Rives LLP, and I am one of the attorneys of record for Oregon Health and Science University, Dr. Charles Henrikson and Dr. Joaquin Cigarroa (collectively "Defendants"). I make this declaration in support of Defendants' Motion to Exclude Experts.

2. Attached as **Exhibit 1** is a true and accurate copy of the expert report authored by Dr. Peter Glick.

3. Attached as **Exhibit 2** is a true and accurate copy of Dr. Glick's deposition.

4. Attached as **Exhibit 3** is a true and accurate copy of the expert report authored by Dr. Molly Carnes.

5. Attached as **Exhibit 4** is a true and accurate copy of Dr. Carnes's deposition.

6. Attached as **Exhibit 5** is a true and accurate copy of the expert report authored by Lisa Broten.

7. Attached as **Exhibit 6** is a true and accurate copy of Ms. Broten's deposition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: March 19, 2024

STOEL RIVES LLP

s/ Megan S. Bradford
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